

# **EXHIBIT A**

Scheef & Stone, L.L.P.  
500 N. Akard, Suite 2700  
Dallas, Texas 75201



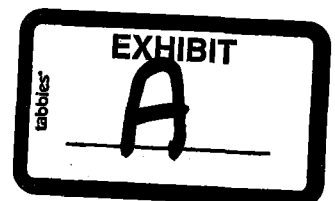
INVOICE

Kelly Crawford Receivership – Metals.co

Statement Date: 12/21/2020  
Account No. 16125.101  
Invoice No. 1008520

Matter 101 - Receiver

			Hours
10/26/2020	KMC	Attend to investor calls and emails; conference with P. Lewis regarding filing notice of withdrawal of motion for contempt; prepare email to Bayside Metals regarding proposed agreement for return of monies; telephone conference with Signature Bank regarding freeze order; conference with P. Lewis and J. Stafford regarding google's refusal to turn over passwords; communicate with California counsel regarding filing notice of stay in federal case; telephone conference with JonMarc regarding investor call; conference with P. Lewis regarding motion to establish procedures for receivership; telephone conference with Simon's wife regarding personal property to be turned over; review inventory of personal property; prepare declaration for Simon's wife to sign regarding her personal property.	4.00
10/27/2020	KMC	Telephone conference with Alabama securities personnel and CFTC regarding entities and employees; review and revise proposed Order regarding procedures in receivership; review and revise proposed Motion regarding procedures in receivership; attend to investor calls or emails; make arrangements for seizing Simon's property; conference with P. Lewis and J. Stafford regarding Google consents and obtaining information from Google to access cloud; communicate with Travelers regarding bond; work on filing Notices of Lis Pendens as to all Philadelphia properties.	4.00
10/28/2020	KMC	Travel from Dallas to Los Angeles ( 4.00 hrs - No Charge); supervise removal of personal property from Simon Batashvili's residence and placement into storage; visit [REDACTED] regarding [REDACTED] and conference with Chase branch manager regarding same; telephone conference with CFTC regarding areas of inquiry for asset deposition.	4.00
10/29/2020	KMC	Review inventory at 8383 Wilshire and meet with prospective purchasers of inventory; conference with J. Brandlin regarding same; conference with Wyatt regarding recovery fees for Ferrari; go to [REDACTED] used by [REDACTED] and interview [REDACTED] at office address regarding Defendants; telephone conference with attorney for Bayside metals regarding possible settlement; authorize release of metals from Bayside metals to investor Julie	



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			Hours
		Charter; travel from Los Angeles to Dallas (4.00 hrs - No Charge).	4.00
10/30/2020	KMC	Telephone conferences with CFTC regarding asset depositions of Simon and Lucas; telephone conference with Arnold regarding logistics of depositions of Simon and Lucas; attend to responding to investor emails and investor calls; telephone conference with [REDACTED] regarding [REDACTED]; conference with P. Lewis regarding pending contracts of sale of real properties and obtaining copies of contracts, and regarding seeking reimbursement of expenses from leasing company related to Ferrari; telephone conference with J. Stafford regarding Google turning over access.	2.50
10/31/2020	KMC	Work on Initial Report; review email regarding Google turning over access and communicate with J. Stafford regarding same; telephone conference with P. Lewis regarding obtaining copies of pending contracts of sale for properties in Philadelphia.	5.00
11/01/2020	KMC	Continue working on Initial Report.	1.50
11/02/2020	KMC	Attend to investor calls; collection of investor information; investor emails; and conference with L. Sanderson regarding same; conference with P. Lewis regarding call with broker handling real properties in Philadelphia; work on preparing for asset depositions of Asher and Simon.	2.75
11/03/2020	KMC	Prepare for depositions of Asher and Batashvili; telephone conference with CFTC regarding same; prepare exhibits for depositions and send to court reporter; send confirmed exhibits to all parties; work on Initial Report; identify [REDACTED] with freeze letter; conference with W. Young regarding Tri-Net not cooperating in turnover of funds; conference with paralegal regarding investor database; attend to investor calls and emails.	6.00
11/04/2020	KMC	Prepare for deposition of Simon Batashvili; take deposition of Simon Batashvili.	6.50
11/05/2020	KMC	Take deposition of Lucas Asher.	6.50
11/06/2020	KMC	Attend to investor calls and emails; revise Initial Report based on information learned during depositions of Asher and Batashvili; conference with attorneys regarding need to file show cause motion against Google for its continued failure to provide access; review and revise motion for show cause; review and revise and execute declaration in support of motion for show cause; review and revise proposed Order.	3.75
11/10/2020	KMC	Finalize Receiver's Initial Report and file with the Court; telephone conferences with [REDACTED] regarding monies frozen and to be returned to Receiver; conference with attorneys regarding Motion for Show Cause Order against Google and getting access to cloud platforms for documents; attend to investor calls and emails; finalize declaration for Fainche MacCarthy regarding personal property; prepare declaration for Fainche MacCarthy for jewelry; communicate with F. MacCarthy regarding same.	4.00
11/11/2020	KMC	Identify additional target to send freeze order to; prepare letter to new custodian for SDIRA; communicate with J. Stafford regarding gaining access	

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			Hours	
		to Salesforce; communicate with J. Stafford regarding status of gaining access to google and google reaction to show cause motion; prepare list of [REDACTED] and circulate to team; communicate with investors; prepare letter to CNA requesting copies of policies insuring defendants; conference with M. Simon regarding unemployment claims being filed by former employees.	5.00	
11/12/2020	KMC	Review mail; discover Bank of America statement; telephone conference with BOA regarding same; prepare letter to BOA regarding same; conferences with P. Lewis and J. Stafford regarding google and review and revise response to email from google attorney; investigate investment in Morgan Stanley building and prepare letter to limited partnership regarding same; prepare letter to [REDACTED] demanding records; attend to investor calls and emails; prepare declaration regarding inventory of items taken from Simon Batashvili home and send to Fainche MacCarthy; revise and execute agreement with Luxury Leasing regarding turnover of Ferrari and Range Rover and reimbursement of expenses.	6.00	
11/13/2020	KMC	Prepare letter to [REDACTED] sending orders and asking for statements; prepare letter to [REDACTED] sending orders and asking for statements; prepare letter to Dillon Gage Precious Metals sending orders and asking for statements; telephone conference with Beau from Alabama Securities Commission regarding consent orders; conference with J. Stafford regarding same; receive and review arbitration demand and conference with J. Stafford regarding filing notice of stay; review Bayside Metals spreadsheet to determine strategy for pending transactions - review prices of gold and silver; begin work on motion to establish claims procedures; begin work on proof of claim form, public notice to claimants, and notice to claimants to accompany proof of claim form; prepare letter to brokers/closers enclosing orders and demanding turnover of records and documents regarding their compensation.	5.25	
11/14/2020	KMC	Prepare Receiver's First Fee Application.	3.00	n/c
11/16/2020	KMC	Communicate with BOA on status of USA Accounts; obtain account information and communicate with CFTC regarding same; telephone conference with CFTC regarding documents that identify investors and claims process; conference with paralegal regarding same; work on transferring Spotify stock to receivership; attend to letters to brokers enclosing SRO and demanding production of documents; review Bayside Metals summary of pending transactions and communicate with attorney for Bayside Metals regarding same; investigate value of paintings in office; communicate with group interested in buying contents of office.	3.00	
11/17/2020	KMC	Telephone conference with J. Stafford and P. Lewis regarding google refusal to provide access, legal arguments, and formulate response to include in brief in support of motion for show cause; telephone conference with CFTC regarding contempt issues arising out of transfer of funds out of USA Accounts, Inc.; communicate with BOA regarding same; telephone conference with C. Thomas to retain him for representation in dispute with BOA; work on liquidation of office contents and conference with P. Lewis regarding [REDACTED]	3.50	

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			Hours
11/18/2020	KMC	Multiple communications with BOA seeking wire transfer backup; obtain backup and send to CFTC; telephone conference with CFTC regarding contempt of Lucas Asher in transferring monies from BOA account; communicate with Robinhood regarding investment of Simon and turning over funds to receivership; communicate with Merrill Lynch regarding status of Spotify stock in account; review transcript of deposition of Simon Batashvalli regarding [REDACTED]; conference with P. Lewis regarding strategy for [REDACTED]; communicate with Arnold Spencer about meet and confer; conference with J. Stafford and P. Lewis regarding obtaining access from google and their request for a subpoena.	5.00
11/19/2020	KMC	Conference with P. Lewis regarding objection to motions to establish procedures; review and revise email to lessor of Wilshire building regarding lease issues; communicate with J. Stafford regarding gaining access to Intuit quickbooks; prepare letter to Randall Kohn demanding return of monies received from USA Accounts after SRO was entered; conference with C. Thomas regarding demand letter to BOA and provide him with relevant information; telephone conference with CFTC and States representatives regarding intent to file show cause motion against Lucas Asher for transferring monies out of account after SRO was entered; telephone conference with Arnold Spencer regarding same and provide deadline for Asher to send monies to receivership equal to amount unlawfully transferred; revise and finalize First Fee Application and send to CFTC and to Defendants for purposes of conferencing(1.00 hr - No Charge); prepare letter to [REDACTED], closer, sending him SRO and making demand for turnover of documents.	5.00
11/20/2020	KMC	Prepare Declaration in Support of Emergency Show Cause Motion against Defendant Lucas Asher; prepare exhibits for declaration; prepare proposed Order for Motion and send to CFTC; revise and finalize First Fee Application and file with the Court with proposed Order (.50 hr No Charge); telephone conference with Beau from Alabama Securities Commission regarding Consent Order; telephone conference with attorney for investor regarding claims process; conference with paralegal regarding Asher deposition transcript and [REDACTED]; email communication with counsel for Pacific Premier Bank regarding applicability of SRO to monies in account; call to Signature Bank regarding status of turnover of funds; conference with P. Lewis regarding reply to objection to motion establishing procedures for receivership.	3.50
11/21/2020	KMC	Receive and respond to communication from Arnold Spencer giving Asher's excuse for transferring monies in violation of the SRO; prepare Motion for Show Cause Hearing to Hold Lucas Asher in Contempt.	4.50
11/22/2020	KMC	Work on Motion for Emergency Show Cause Hearing to Hold Asher in Civil Contempt and Brief in Support.	3.00
11/23/2020	KMC	Continue working on Motion and Brief in Support for Show Cause Hearing to Hold Lucas Asher in Civil Contempt; gather additional evidence to support Motion; revise Declaration in support of Motion to add exhibits; prepare Appendix in support of Motion; finalize pleadings and have filed with the Court; telephone conference with Randall Kohn about intent to return monies	

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			Hours
		received from Asher after SRO; telephone conference with CFTC regarding same; prepare email to CFTC regarding same; send wire instructions to Kohn; conference with T. Gomersall regarding investors; conference with paralegal regarding database for investors; telephone conference with C. Thomas regarding call from BOA attorney.	6.00
11/24/2020	KMC	Review Brief in Support of Motion for Contempt filed by Plaintiffs; telephone conference with P. Lewis, J. Stafford, and Priya to discuss response to Google's continued refusal to turnover access to googlesuites; telephone conference with Randall Kohn regarding turnover of \$250,000 [REDACTED]; [REDACTED], prepare demand letter to turn over \$300,000 received after SRO was entered; inform A. Spencer of receipt of \$250,000 from Kohn and repeat demand for turn over of \$300,000; investigate [REDACTED]; [REDACTED]; communicate with CFTC regarding same; provide additional information to Paypal and Venmo regarding defendants; telephone conference with Signature Bank about turnover of frozen funds.	5.00
11/25/2020	KMC	Obtain medallion signature on stock transfer document for Spotify stock; prepare letter to Computershare regarding transfer of Spotify stock to receiver; telephone conference with P. Lewis regarding [REDACTED]; [REDACTED]; legal research for google issues and legal research regarding [REDACTED]; communicate with P. Lewis regarding same; communicate with PayPal regarding turnover of funds and statements; telephone conference with R. Foelber regarding contempt hearing; send email to Arnold Spencer directing Lucas Asher to follow steps for resetting password with Google.	4.00
11/28/2020	KMC	Respond to investor emails; review message from attorney for recipient of monies from Bank of America and communicate with C. Thomas regarding response.	0.25
11/30/2020	KMC	Telephone conference with CFTC regarding Asher contempt hearing; conference with P. Lewis and J. Stafford regarding Google contempt motion and strategy; communicate with process server regarding [REDACTED]; [REDACTED]; telephone conference with investor; communicate with Bayside Metals regarding metals on deposit for receivership entities; receive checks from Signature Bank and deposit into receivership account; telephone conference with attorneys representing David Breeden, broker regarding claim for return of commissions.	3.50
12/01/2020	KMC	Communicate with counsel for Asher about gaining access to google; conference with P. Lewis and J. Stafford regarding same and strategy for contempt hearing; telephone conference with process server regarding [REDACTED]; [REDACTED]; telephone conference with CFTC regarding contempt hearing strategy, bayside metals, and claims process; investigate status of metals held by bayside for two investors; work on getting video clips for contempt hearing; receive and review response to contempt motion filed by Arnold Spencer; telephone conference with D. Roosien about potential representation of Athena Hunter.	4.50
12/02/2020	KMC	Conference with P. Lewis regarding strategy for contempt hearing; telephone conference with court clerk regarding Asher's availability for hearing; issue	

## Matter 101 - Receiver

			Hours
		check to Arnold Spencer for travel expenses for Asher and communicate with Arnold Spencer regarding same; review and revise motion for continuance of google contempt motion; view video clips fom deposition in preparation for hearing; telephone conference with CFTC and States regarding contempt hearing; telephone conference with C. Thomas regarding BOA freezing account in name of [REDACTED]; investigate ownership of [REDACTED] and send information to C. Thomas to support freeze on account; investigate ownership and control of [REDACTED] and [REDACTED].	6.00
12/03/2020	KMC	Prepare for contempt hearing; numerous communications with CFTC; conferences with P. Lewis regarding same; prepare direct examination of receiver; gather exhibits; communicate with State of Texas regarding cease and desist order and calls from Athena Hunter to investor.	5.00
12/04/2020	KMC	Prepare for and attend contempt hearing; telephone conference with CFTC regarding same and strategy; communicate with C. Thomas regarding BOA turning over monies to receivership.	8.50
12/07/2020	KMC	Telephone conference with CFTC regarding deposition of Athena Hunter and strategy for continued contempt motion; telephone conference with A. Spencer regarding contempt motion; telephone conference with C. Thomas regarding status of BOA turnover of funds; receive and begin review of bank statements from Wells Fargo; revise Notice of Deposition for Athena Hunter and prepare duces tecum to include in deposition notice; prepare exhibits for deposition and send to counsel for Athena Hunter; [REDACTED] [REDACTED]; conference with P. Lewis regarding status of Order authorizing procedures for receivership and vacating office space at 8383 Wilshire; [REDACTED] regarding entities owned or controlled by Defendants known to receiver; communicate with investors regarding receivership.	5.00
12/08/2020	KMC	Numerous communications with A. Spencer and with CFTC regarding resolving contempt against Asher; prepare proposed Agreed Order Holding Asher in Contempt; communicate with counsel for Athena Hunter regarding her deposition; communicate with counsel for Talent Writers regarding wiring funds to receivership account; communicate with all counsel regarding intent to move forward with deposition of Athena Hunter unless monies are returned and there is an Agreed Order signed by Asher; prepare for Hunter deposition and gather additional evidence regarding USA Accounts, Inc. [REDACTED]	5.50
12/09/2020	KMC	Work on contempt motion against Asher; numerous telephone conferences with A. Spencer regarding same; numerous telephone conferences with CFTC regarding same; revise proposed Agreed Order and send to A. Spencer; communicate with C. Thomas regarding status of monies at BOA; attend to investor calls; conference with P. Lewis regarding status of Order Establishing Procedures for Receivership; revise letter to Judge Lindsay tendering Exhibit 4A - transcript of calls.	4.00
12/10/2020	KMC	Numerous communications with A. Spencer regarding status of Order; telephone conference with CFTC regarding strategy with respect to presenting	



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			Hours
		Order to Court; communicate with counsel regarding status of BOA payment; communicate with CFTC regarding Barrick Gold complaint about use of Barrick Capital name; conference with team handling investor calls regarding information in investor database; communicate with New Mexico regulators regarding New Mexico victims being added to database; review Manufacturer's bank documents and communicate with P. Gommersal regarding same; investigate [REDACTED] and [REDACTED]; work on sales of personal property.	3.50
12/11/2020	KMC	Prepare letter to Bayside Metals making request for production of documents; telephone conference with FBI; telephone conferences with CFTC regarding status of contempt motion against Asher; receive and review list of accounts provided by Arnold Spencer and communicate with A. Spencer regarding same; respond to CFTC inquiry about status of contempt proceedings; conference with counsel regarding status of BOA turning over monies to receivership; receive some bank records from BOA; review same and send to J. Brandlin; communicate with J. Brandlin regarding forensic accounting scope; conference with P. Lewis regarding call with attorney for Fainche Batashvili; conference with P. Lewis regarding vacating lease premises and sale of inventory.	4.25
12/14/2020	KMC	Telephone conference with R. Foelber regarding proposed amendment to Agreed Order received from A. Spencer; revise Agreed Order and send to A. Spencer; obtain Order and have submitted to the Court for consideration; telephone conference with attorney for D. Bleeden regarding document production and potential settlement of claim to recover commissions; receive and review document production from D. Bleeden; communicate with J. Rolls regarding solicitation of bids for purchase of inventory of office; conference with P. Lewis regarding Fainche turning over gold jewelry; receive check from BOA as remainder of funds owing from improper transfer by Asher; prepare questionnaire to send to investors.	4.25
12/15/2020	KMC	Conference with P. Lewis regarding Court requesting motion for entry of order and continuance; prepare motion for entry of order and continuance and prepare proposed order regarding same and have filed with the court; communicate with parties regarding entry of order and vacating of hearing; receive and review email from Bayside attorney [REDACTED]; communicate with investors; telephone conference with J. Brandlin regarding access to records and focus of forensic accounting; communicate with J. Rolls regarding inspection of inventory at office for solicitation of bids; communicate with W. Young regarding appraiser of personal property to be sold; review proposed Stipulation of Injunction to file in Colorado Securities Action and add footnote to same; communicate with J. Stafford regarding same.	3.00
12/16/2020	KMC	Telephone conference with investor; telephone conference with attorney for Bayside Metals.	0.50
12/17/2020	KMC	Finalize questionnaire to send to investors; prepare letter to investors; conference with paralegal regarding mailing of questionnaire and input of information on spreadsheet from questionnaire for purposes of calculating allowed claim; communicate with Bayside and with investor L. Ball regarding options between receiving metals of liquidation value of coins; telephone	



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		conference [REDACTED], telephone conference with attorney for Bayside regarding checks made payable to Eugene Fogel and regarding payment of monies to investors from liquidation of coins.	3.00	
12/18/2020	KMC	Prepare email to C. Thomas with request of BOA to produce documents regarding Talent Writers account and cite provisions under Orders that require production; telephone conference with C. Thomas regarding same; prepare email to C. Thomas with request for BOA to produce remaining documents for closed accounts; prepare letter to General Counsel of Computershare regarding transfer of Spotify stock for liquidation; communicate with Capital Bank regarding status of production; receive and review bid for purchase of inventory; conference with paralegal regarding questionnaire to investors; telephone conference with representative of elderly investor; communicate with investor choosing to receive metals from Bayside Metals and communicate with Bayside Metals regarding same; conference with J. Brandlin regarding quickbooks and bank records accounting.	3.00	
12/21/2020	KMC	Review bank records of Talent Writers, LLC and send to CFTC; telephone conference with investors regarding Tower Equity note investment.	0.75	
		For Current Services Rendered	177.75	69,322.50

## Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Kelly M. Crawford	177.75	\$390.00	\$69,322.50

09/26/2020	DFW Airport Parking Expense (314) Kelly Crawford	96.00
10/19/2020	Airfare Expense - AMERICAN AIRLINES DFW to LAX for KMC (KMC Firm CC)	692.20
10/30/2020	Lodging Expenses for KMC /MARRIOTT (KMC Firm CC)	230.24
11/25/2020	Kelly Crawford Business Meals allowance - Per Diem	66.00
12/18/2020	Postage	39.00
	Total Expenses	1,123.44
	Total Current Services and Expenses	70,445.94
	Previous Balance	\$49,582.21
11/22/2020	Cost payment - thank you - check 1005	-1,807.21
11/22/2020	Fee payment - thank you - check 1004	-38,220.00
	Total Payments	-40,027.21
	Balance Due	<u>\$80,000.94</u>

## Past Due Amounts

<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
0.00	9,555.00	0.00	0.00	0.00	0.00

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TERMS: Due and Payable Upon Receipt